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PARALEGALS

ROSA COLLINS
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Via: ECF

April 4, 2023

Honorable Judge James R. Cho
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Aaron Smith, et al. v. Lina Vivas Maintenance, Inc., et al.*; 22-cv-1862(PKC)(JRC)

Dear Hon. Judge Cho,

My office represents Defendants, Lina Vivas Maintenance, Inc. and Lina Vivas in connection with the above-referenced FLSA action. I write jointly with counsel for Plaintiffs, who has reviewed this letter and consents to its filing. Kindly accept this correspondence as the Parties' Joint Status Letter and request to extend the discovery deadline.

The Parties are amenable to a settlement conference and respectfully request such conference with the Court. Counsel has the following dates available: May 19, May 22, and May 23, 2023. Should the Court find none of these dates convenient, the Parties are willing to coordinate another date with the Court.

Additionally, the Parties request an extension of the discovery deadline. The former discovery deadline in this matter was March 16, 2023, and during the Parties' status conference held on February 15, 2023, Your Honor extended the written discovery deadline to March 31, 2023. As there is still outstanding discovery in this matter – specifically, depositions still need to be completed and Plaintiffs have not yet responded to Defendants' discovery requests – the Parties respectfully request an extension of the discovery deadline to July 28, 2023.

Thank you for your time and attention to this request.

Respectfully submitted,

Victoria Spagnolo
Victoria Spagnolo, Esq.

cc: All counsel of record, via ECF.